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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BEFORE THE

Federal Communications Commission

WASHINGTON, D. C. 20554

In the Matter of

Modifying Renewal Dates for Certain
Stations Licensed Under Part 74 of
the Commission's Rules, and

Revising FCC Form 303-S, Application
for Renewal of License for Commercial
and Noncommercial AM, FM or TV
Broadcast Stations

MM Docket No. 92-168

To: The Commission

COMMENTS OF THE POST COMPANY

The Post Company ("Post") hereby provides its comments in support of the Commission's Notice of Proposed Rule Making (FCC 92-345, released August 4, 1992) proposing to simplify and reduce the paperwork associated with the processing of renewal applications for FM and TV translator stations. In support thereof, the following is stated.

The Commission proposal would change the license renewal dates of FM and TV translator stations and low power television stations to that of full power stations operating in the same state. Additionally, the Commission proposes to revise FCC Form 303-S to permit the use of a single renewal application form by licensees of full power broadcast stations, which also seek to renew their commonly-owned translator or LPTV stations that have the same renewal dates.

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Post applauds the Commission's initiative in proposing these revisions to its rules. The proposals will significantly simplify and reduce the paperwork associated with the renewal process.

The Post situation illustrates the good sense of these proposals. Post is the licensee of Station KIFI-TV (Channel 8), Idaho Falls, Idaho. It is also the licensee of six translators in Idaho and four translators in Wyoming.¹ All of these translators rebroadcast the signal of Station KIFI-TV. Idaho and Wyoming television stations have the same renewal filing date.

The renewal filing dates for Station KIFI-TV and the Idaho translators are three years apart. The renewal filing dates for Station KIFI-TV and the Wyoming translators are eight months apart. Accordingly, Post must file a separate application for the renewal of Station KIFI-TV and then, 8 months later, must file an additional four applications for the renewal of its Wyoming translator stations and 36 months later must file six applications for the renewal of the Idaho translators. And, of course, these eleven applications must be processed by the Commission's staff. Under the Commission's proposal Post could file for renewal of all eleven stations on one form since the filing dates for Idaho and Wyoming full service stations are the same. As such, consolidating the renewal dates for translators to correspond with the filing date for full service stations, and permitting stations with the same filing date to utilize the same form, will significantly simplify and minimize the renewal filings for both Post and the Commission.

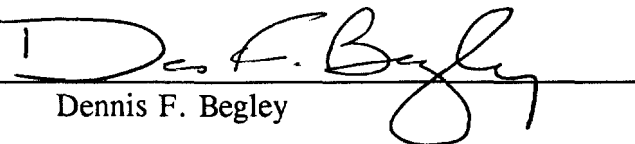
¹ K61AP, Burley, Id.; K12MA, Rexburg, Id.; K13RV, Leadore, Id.; K61CI, North of Leadore, Id.; K05CJ, Challis, Id.; K13CO, Lava Hot Springs, Id.; K09LF, South Park, Wy.; K13LY, Hoback Junction, Wy.; K13FZ, Jackson, Wy.; and K59DY, Jackson/Wilson, Wy.

3.

Moreover, the consolidation of the renewal filing dates will eliminate confusion to the public with respect to the Commission's processes as well as facilitate its participation in the renewal process. For example, with the renewal filing for Station KIFI-TV, Post broadcasts on Station KIFI-TV the required pre-filing and post-filing announcements. See Section 73.3580(d). These announcements are rebroadcast by the translators potentially leading the public to believe that the translator licenses also are being renewed. However, when the renewal licenses for the translators are filed, there is no requirement for an on-air notice. See Section 73.3580(g). As such, unless a viewer observes the notice in the local newspaper, he or she probably is unaware that the translator station license is being renewed. Accordingly, the consolidation of renewal dates will facilitate the public's awareness of the renewal filings for both translators and full-power stations thereby eliminating potential confusion and facilitating the public's participation in the renewal process. And, as the Commission has noted, public awareness will further be maximized by the adoption of common deadlines since different stations in the same state will have the same renewal dates.

In light of the above, The Post Company supports the proposals set forth in the Notice of Proposed Rulemaking and encourages their prompt and full adoption.

THE POST COMPANY

By 
Dennis F. Begley

Its Counsel

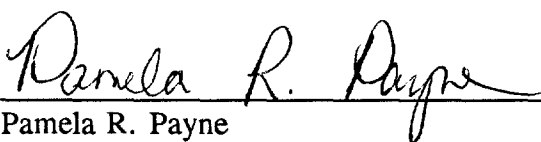
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September 28, 1992

CERTIFICATE OF SERVICE

I, Pamela R. Payne, hereby certify that on this 28th day of September, 1992, a
copy of the foregoing **COMMENTS OF THE POST COMPANY** was hand delivered to:

Ms. Eugenia R. Hull
Federal Communications Commission
Mass Media Bureau
2025 M Street, N.W., Room 8002
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Pamela R. Payne